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December 18, 2003

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VIA HAND DELIVERY

Hon. Deborah Taylor Tate, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

In Re: **Petition for Exemption of Certain Services**
Docket No. 03-00391

Dear Chairman Tate:

Enclosed are the original and fourteen copies of *BellSouth Telecommunications, Inc.'s Proposal Regarding Procedural Schedule*. BellSouth has circulated the Proposal to counsel for all the parties on the docket. BellSouth has received no objections to this proposal from any of the parties. Copies of the enclosed are being provided to counsel of record.

Very truly yours,

Joelle J. Phillips

JJP:ch

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In Re: *Petition for Exemption of Certain Services*

Docket No. 03-00391

BELLSOUTH TELECOMMUNICATIONS, INC.'S PROPOSAL
REGARDING PROCEDURAL SCHEDULE

BellSouth Telecommunications, Inc. ("BellSouth") files this *Proposal Regarding Procedural Schedule*, as instructed by the Hearing Officer's Order of December 11, 2003, and respectfully shows the Tennessee Regulatory Authority ("TRA" or "Authority") as follows:

BellSouth's *Petition for Exemption of Certain Services*, filed June 16, 2003, seeks an exemption under T.C.A. §65-5-208(c) for two services: (1) intraLATA toll service and (2) Primary Rate ISDN Service ("PRI").

In light of discussions regarding the issue of exemption of services during the CSA docket, BellSouth expects that there may be substantial areas of agreement among the parties regarding certain exemptions relating to IntraLATA Toll Service. Consequently, BellSouth believes it may be more manageable to treat that issue first, before addressing exemptions relating to PRI service. In order to determine whether it may be possible to address the IntraLATA Toll Service in a more expedited fashion (for example, by a "paper" hearing without live testimony), BellSouth proposes that a brief comment period be established. During this comment period, parties would provide written comments regarding the exemption relief BellSouth seeks for intraLATA toll

service, in order to determine the actual scope of any issues raised by BellSouth's request for exemption of that service.

As a substantive matter, BellSouth's position is that the Authority should exempt intraLATA toll service from regulatory requirements such that intraLATA toll service would be treated just as interLATA toll service is currently treated by the Authority. Consistent with the treatment of interexchange carriers, parties offering intraLATA toll service would file informational tariffs, but the price for such service would not be subject to TRA regulation. As a result, parties offering intraLATA toll service would be required to file informational tariffs and the same filing time periods would apply as those applied in the context of interLATA toll services. BellSouth does not seek any further exemptions relating to the treatment of intraLATA toll service.

In order to clarify the scope and type of any questions or issues relating to the relief sought by BellSouth regarding intraLATA toll service, BellSouth proposes that any party wishing to comment on this relief be required to file its comments by January 12, 2004 and any party wishing to file reply comments be required to file those comments by January 26, 2004. BellSouth further proposes that parties to the docket be given until February 6, 2004, to submit a mutually-agreeable proposed schedule for addressing any further procedural process relating to the intraLATA toll relief. Following resolution of the intraLATA toll issue, the parties could make further scheduling proposals addressing the other relief sought in this docket. BellSouth believes that, after reviewing any comments filed, it will be more clear what sort of procedural process would be needed.

BellSouth believes that the filing of comments by parties regarding the relief being sought relating to intraLATA toll service will clarify the areas of dispute, if any, relating to the relief sought. Depending upon what those comments demonstrate, BellSouth believes it is likely that, with respect to intraLATA toll service, the parties may reach agreement with respect to the submission of this issue to the TRA on the basis of a paper hearing, which would result in a more efficient use of TRA resources during this particularly busy time. Moreover, proceeding in this docket to address the request regarding intraLATA toll first, before turning to the relief requested regarding PRI service, will result in a more straightforward and focused proceeding.

For the foregoing reasons, BellSouth urges the Hearing Officer to order: (1) that initial comments be filed on January 12, 2004, (2) that reply comments be filed on January 26, 2004, and (3) that proposals regarding additional scheduling in this docket be filed on February 6, 2004.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.

By: _____


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CERTIFICATE OF SERVICE

I hereby certify that on December 18, 2003, a copy of the foregoing document was served on the parties of record, via the method indicated:

- ☐ Hand
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- ☒ Electronic

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